

March 20, 1987
File #492-7



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Ken
Eder associates
consulting engineers, p.c.

REGISTERED MAIL

Ms. Luetta Flournoy
United States Environmental
Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101



Re: Eagle Signal Controls Division
Wickes Manufacturing Company
Davenport, Iowa
EPA I.D. No. IAD051001337

Dear Ms. Flournoy:

Eder Associates Consulting Engineers submits this letter on behalf of Eagle Signal in response to the United States Environmental Protection Agency's (USEPA) January 6, 1987 letter to Mr. Patil of Wickes Manufacturing Company.

The USEPA's January 6, 1987 letter requested that Eagle Signal submit the following:

1. A closure performance standard for the drum storage area;
2. A Professional Engineer's Closure Certification;
3. Source(s) of stained asphalt - concrete in the drum storage area; and
4. The RCRA Facility Assessment (RFA) option which would be implemented by Wickes.

The following actions have been undertaken in response to the Agency's requests:

1. The closure performance standard was specified in Eder Associates' July 27, 1984 letter to the Iowa Department of Water, Air and Waste Management (IDWAWM), which specified the closure plan for the drum storage area at Eagle Signal. Cleanup was performed in August 1984 to background levels on the basis of a visual inspection. This performance standard was accepted by both the USEPA and the IDWAWM at the time of closure in August 1984.
- 2 & 3. A closure certification prepared by Eder Associates is included with this letter. Please note that the state did not require an engineer's certification at the time of closure in 1984. The owner's certification followed by a state inspection was accepted by the state in 1984 in lieu of the engineer's

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certification. The owner's certification was provided to the state in September 1984. The state inspection was conducted in August 1984.

The state reported in August 1984 that the drum storage area was cleaned in accordance with the closure plan. Stains of the asphalt-cement in the area were observed by the state in August 1984, but as noted in their inspection report, these stains did not appear to be the result of spilled waste. In September 1984, the state accepted that closure had been completed and recommended to the USEPA that Interim Status of the facility be terminated.

On March 13, 1987, Eder Associates visually inspected the former drum storage area. There were no wastes or waste residues evident in the area. Some stains of the asphalt-cement were observed, however, this area was used as a parking lot, and the stains identified by Eder Associates and the state during inspections in February 1984 and August 1984 are apparently: 1) those typically found in a parking lot (oil drip stains); and 2) rust.

4. Wickes Manufacturing has decided to allow the USEPA to conduct the RFA at Eagle Signal.

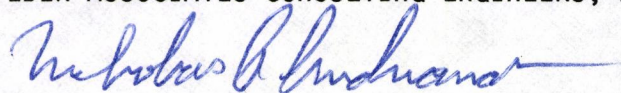
This letter satisfies the closure requirements and USEPA should release Wickes from the financial requirements of 40 CFR Parts 265.143 (h) and 265.147 (a) in accordance with the USEPA's January 6, 1987 letter.

Please indicate in writing that Wickes Manufacturing has satisfied USEPA RCRA closure requirements for the drum storage area.

Thank you for your consideration and cooperation.

Very truly yours,

EDER ASSOCIATES CONSULTING ENGINEERS, P.C.



Nicholas A. Andrianas
Project Engineer

NAA/tg
Attmt.

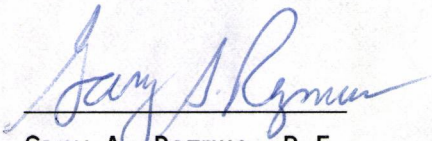
cc: J. Degryse

RCRA CLOSURE CERTIFICATION (40 CFR 265.115)

Facility: Eagle Signal Controls Division
Wickes Manufacturing Company
Davenport, Iowa
EPA I.D. No. 051001337

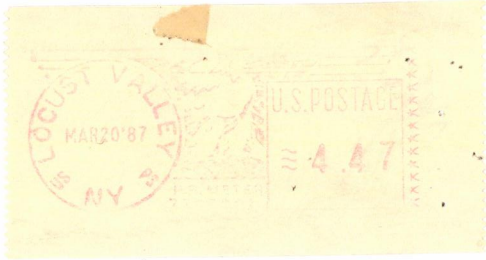
Based on our review of closure documents provided by Wickes and our visual inspection of the site, made on March 13, 1987, this letter certifies that the site has been closed in accordance with the specifications in the closure plan as provided in 40 CFR 265.115.

EDER ASSOCIATES CONSULTING ENGINEERS, P.C.



Gary A. Rozmus, P.E.

Vice President



Claim Check
No.
014038

☐ Hold

Date
3/25

1ST Notice

2ND Notice

Return

Detached from
PS Form 3849-A,
Oct. 1985

**RETURN RECEIPT
REQUESTED**

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R 267 043 583

Ms. Luetta Flournoy
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PROTECTION AGENCY
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726 Minnesota Avenue
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